

**SANTA MONICA MOUNTAINS CONSERVANCY**

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August 17, 2015

Karen Hoo  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

**Notice of Preparation Comments**  
**Andora Project, Chatsworth, Simi Hills**  
**SCH No. 2015021057**

Dear Ms. Hoo:

The Santa Monica Mountains Conservancy (Conservancy) provides the following comments on the proposed 42-unit project on 91 acres between Santa Susana Pass State Historic Park and Chatsworth Oaks Park-Chatsworth Reservoir Preserve in the Simi Hills. In March of this year the Conservancy adopted a comment letter on the project. That draft comment letter included an alternative project footprint with 18 building sites and an emergency access road. Prior to sending in the letter to the City, our staff met onsite with the applicant to test the validity of this suggested 18 unit project. It became clear that the smaller project footprint had not integrated many key site constraints and opportunities. That letter was never finalized and submitted to the City.

Since that time our staff has worked with the applicant to address concerns and can now conditionally support the 35 lot (33 residential lots and 2 open space lots) project alternative. The Conservancy lends its support to the project as proposed if all of the below described conditions are met by the applicant.

The Conservancy's principal habitat loss concerns would be addressed by agreed upon pre-entitlement donations of conservation easements to the Mountains Recreation and Conservation Authority (MRCA). Such actions would include a conservation easement on an adjacent 3.5-acre parcel not included in the tract map and conservation easements over all of the proposed open space lots. This set of conservation easements would be temporary because if the project is not approved they would lapse. If the project is approved they would become permanent and some would convert into fee simple open space for the MRCA. The Conservancy will work with the applicant and the MRCA on these public benefits independent of the CEQA process.

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The Conservancy understands that the applicant has applied or will apply to the City for a 42 residential lot project, but in the soon-to-be-released Draft Environmental Impact Report (DEIR), the reduced 33 residential lot project was found to be the environmentally superior project. The Conservancy further understands that the applicant will accept and subsequently proceed with this reduced, environmentally superior project. As outlined below, the Conservancy conditionally supports the reduced 33 residential lot project. The 33-unit footprint adequately clusters the project because of its compact design. The certain public benefits of receiving the permanent fee simple open space, conservation easements, and public trails on balance outweigh the habitat loss impacts of grading for the 33 homes, roads, and retention basin.

Because the project is located in a natural bowl, many of the earlier visual impact concerns from existing public lands, including annual brush clearance and night lighting, do not appear to be significant.

Other than its contribution to the Simi Hills core habitat area, the primary biological attribute of the subject 91 acres is the connectivity it provides between the eastern Simi Hills (State Historic Park) and the Chatsworth Reservoir Natural Preserve. The proposed 33-unit project configuration combined with both the proposed 3.5-acre offsite parcel and lot 11 rear lot conservation easements, provides adequate local and regional habitat connectivity. In general the proposed conservation easements on each development lot would guarantee a compact lighting, fencing, and disturbance footprint that might not be obtainable with a lower density, ranchette-style project. The applicant is also proposing the pre-entitlement conservation easement donation of an adjacent 3.5-acre trapezoid-shaped lot where that habitat linkage would be at its most narrow dimension.

The Conservancy's support is also conditionally based on the applicant agreeing to eliminate an agreed upon portion of the pad area and associated hillside cut for lot 11. The applicant has also agreed to restrict the height of all structures on lots 25 and 26 to a maximum of 26 feet. In addition the applicant has agreed that no fencing would be allowed in any conservation easement area or off the pad areas except for on lots 25-33 where they would be located slightly downslope from the pads.

To date the applicant has promised public trail access from the Andora Avenue through the project into the proposed open space lots. Under the proposed agreement between the MRCA and the applicant, the MRCA would be the fee simple owner of all the open space lots. In such case the MRCA would have control of the existing onsite trail system already used

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by the public. It makes management and continuity sense that the MRCA would also receive the trail easements within the tract too. Ideally the DEIR would describe the internal trails, the rear lot conservation easements, and the open space lots as going to the MRCA.

In addition the applicant has agreed to conditions where those sections of public trail internal to the tract would be maintained by the Homeowners Association. We request that the DEIR reflect this maintenance obligation.

Lastly, the applicant has agreed to pay the MRCA \$15,000 for signage and site clean up on the site for both the trails and the open space. That payment timing will be worked out with the applicant.

Without at all adversely impacting the feasibility or time frame of the applicant's project, we urge both the applicant and the City to maximize the amount of storm water runoff not released to the storm drain system. The more water shunted to the open space areas, the better.

Please direct any questions and all future documents pertaining to this case to Paul Edelman of our staff at the above letterhead address or by phone at 310-589-3200, ext. 128.

Sincerely,

LINDA PARKS  
Chairperson